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**VIA ECF and E-MAIL**

Honorable Andrew L. Carter, Jr.  
United States District Court Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Room 435  
New York, New York 10007-1312  
ALCarterNYSDChambers@nysd.uscourts.gov

**Re: *In re North Sea Brent Crude Oil Futures Litigation*,  
13-md-2475 (ALC)**

Dear Judge Carter:

We are counsel for the plaintiff, Aaron Schindler, in *Schindler v. Royal Dutch Shell PLC et. al*, 1:13-cv-08240-ALC (S.D.N.Y.), pending before Your Honor. The *Schindler* action was filed on November 18, 2013 and referred to Your Honor as possibly related to *Prime International Trading, Ltd. v. BP Plc et. al*, 1:13-cv-3473 (S.D.N.Y.), one of the cases consolidated in the above-referenced action pursuant to the Court's Pretrial Order No. 1. (Dkt. 72) On November 20, 2014, Mr. Schindler filed his Memorandum of Law in Support of Motion of Plaintiffs Kevin McDonnell, Anthony Insinga, Robert Michiels, John Devivo and Neil Taylor to Appoint Kirby Mcinerney as Interim Lead Counsel (Dkt. 11) in the action now designated as *In re: North Sea Brent Crude Oil Futures Litigation*, 13-md-2475 (ALC). Although the *Schindler* action remains on the docket as related to *In re North Sea Brent Crude Oil Futures Litigation*, it was not consolidated with that case pursuant to Pretrial Order No. 1. The undersigned respectfully submits that that *Schindler* action is related to the actions consolidated in *In re North Sea Brent Crude Oil Futures Litigation* and should also be consolidated in that litigation.

We are available to address any questions the Court may have.

Respectfully submitted,



Merrill G. Davidoff

MGD/sll

cc: All counsel of record (via ECF and email)